COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY

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| Investigation by the Department of Telecommunications and Energy on its own Motion into the Appropriate Pricing, based upon Total Element Long-Run Incremental Costs, for Unbundled Network Elements and Combinations of Unbundled Network Elements, and the Appropriate Avoided Cost Discount for Verizon New England, Inc. d/b/a Verizon Massachusetts' Resale Services in the Commonwealth of Massachusetts | D.T.E. 01-20 |

**AT&T's FIFTEENTH SET OF INFORMATION REQUESTS TO VERIZON**

AT&T Communications of New England, Inc. hereby submits the following information requests to Verizon. Please provide responses to these requests as they are completed.

Instructions

Each request should be answered on a separate page preceded by the request and by the name of the person responsible for the answer.

Please provide answers as they are completed.

These requests shall be deemed continuing so as to require supplemental responses if Verizon subsequently receives or becomes aware of additional information responsive to these requests.

If an answer refers to Verizon's response to another information request in this proceeding, please provide that response with the answer.

If Verizon cannot answer a request in full, answer to the extent possible and state why Verizon cannot answer the request in full.

If Verizon refuses to respond to any request by reason of a claim of privilege, state the privilege claimed and the facts relied upon to support the claim of privilege.

Unless otherwise stated, these requests concern Verizon's Massachusetts intrastate operations.

INFORMATION REQUESTS

ATT-VZ 15-1. Provide all details, including all responsive documents (in both electronic and hard copy format), supporting the quantity of UDLC used in the switch study.

ATT-VZ 15-2. Referring to Verizon's response to ATT-VZ 4-7:

(a) Quantify the amount of IDLC in the loop study compared to the amount of IDLC in the switch study.

(b) Identify the amount of IDLC in the loop study that is assumed to be UDLC at the switch interface. Specify whether this quantity is based on the existing network or whether forward-looking estimates were assumed. Specify whether the amount was developed on a switch by switch basis. If the amount was not developed on a switch by switch basis, state exactly how Verizon developed the IDLC inputs to SCIS.

ATT-VZ 15-3. Referring to Verizon's response to ATT-VZ 4-14, identify how many years of demand is considered when initially installing power plant for a switch.

ATT-VZ 15-4. Referring to Verizon's response to ATT-VZ 4-17, provide supporting accounting guidelines and all other documentation that shows that sales taxes are in the installed investment account and not the material investment account. Also quantify the applicable sales tax percentage VZ-MA pays for switch equipment.

ATT-VZ 15-5. Referring to Verizon's response to ATT-VZ 4-22, state whether central office switch engineers charge the same account as central office transport engineers. If the answer is no, provide a breakdown of expenses by account. Also provide the percentage of engineers involved in digital switching vs. the percentage of engineers involved in digital transport and other engineers primarily involved in digital circuit equipment.

ATT-VZ 15-6. Referring to Verizon's response to ATT-VZ 4-26, provide list and net prices that Verizon paid for the equipment used to convert the following offices from a remote switch to a host or standalone switch:

(a) KGTNMASLDS0

(b) NCKTMAUNDS0

ATT-VZ 15-7. State whether the power being booked to the digital switch 2212 account includes all power for digital circuit equipment. If the answer is no, explain how the power is identified and calculated for digital circuit equipment separately from digital

switching.

ATT-VZ 15-8. Does Verizon assumes that the objective fill is the maximum and that growth jobs are instituted before the maximum fill is reached, resulting in a very low fill right after a growth job and something slightly less than the maximum fill just before a growth job? If the answer is no, explain why and produce the calculations and assumptions Verizon used to develop the fill factors in its study. If the answer is yes, identify the timeframe assumed by Verizon when determining the average utilization between growth jobs for:

(a) Line fill

(b) Trunk fill

ATT-VZ 15-9. Referring to Verizon's response to ATT-VZ 4-46:

(a) Quantify the designed busy hour minute of use capacity and compare and contrast this with the designed busy hour minute of use capacity adjusted for the mid-point of the growth cycle.

(b) Identify the switch growth cycle time period (e.g., one year growth cycle) used in the local switch MOU and contrast this with the growth cycle time period assumed for the trunk MOU. Show all calculations.

ATT-VZ 15-10. Referring to Verizon's response to VZ-ATT 4-57, provide the Lucent list of equipment types and prices.

ATT-VZ 15-11. Specify the maximum engineered CCS trunk capacity (per trunk) for a trunk group with greater than 10 trunks (DS0s).

ATT-VZ 15-12. Identify the percentage of Verizon-Massachusetts end office trunk groups that have more than 10 trunks (DS0s).

Respectfully submitted,
AT&T COMMUNICATIONS OF
NEW ENGLAND, INC.
By its attorneys,

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